

**REMARKS**

**Status Of Application**

Claims 1-20 are pending in the application; the status of the claims is as follows:

Claims 1-6, 9-17, 19 and 20 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,190,172 B1 to Lechner ("Lechner").

Claims 7, 8, 17 and 18 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lechner in view of U.S. Patent No. 6,377,230 B1 (NOTE – THE OFFICE ACTION SHOWS PATENT NO. 5,579,026) to Yamazaki et al ("Yamazaki").

**Claim Amendments**

Claims 1 and 11 have been amended to more clearly specify the claimed invention. These changes are not necessitated by the prior art, are unrelated to the patentability of the invention over the prior art, and do not introduce any new matter.

**35 U.S.C. § 102(e) Rejection**

The rejection of claims 1-6, 9-17, 19 and 20 under 35 U.S.C. § 102(e) as allegedly being anticipated by Lechner, is respectfully traversed based on the following.

The Lechner patent shows a visual display system. This provides multiple screens (**collectively 12 or individually 14, 16, 18**) to surround the user to provide a total immersion effect. One projector 28 is provided for each screen (column 6, lines 65-67). Each projector is a separate display device (column 7, lines 9-20). The screens may have an aspect ratio of 4:3 or 3:4 (column 8, lines 10-36). The aspect ratio is the ratio of the width of the screen to the height of the screen. For each type of aspect ratio, one projector is used for each screen. (column 8, lines 27-36).

In contrast to the cited prior art, claim 1 includes:

- at least two screens onto which images are projected;
- at least one display device for displaying the images that are to be projected onto the screens, wherein the images projected onto two of said at least two screens are different, a total number of display devices being smaller than a total number of screens; and
- at least one projection optical system for projecting the images displayed on the display device onto the screens.

The rejection states that Lechner shows "a total number of display devices being smaller than a total number of screens (see column 8, lines 15-22, because the width of the displayed video image on each side screen is less than the height of the displayed video image)." However, as noted in Applicants' prior response, the height and width of the screens is irrelevant to the relationship between the number of projectors and the number of screens. Lechner does not show or suggest at least one display device for generating projected images projecting onto at least two screens where there are fewer display devices than screens.

In addition, the Examiner has stated in the Remarks to the Advisory Action of that the item labeled 12 in Figure 4 meets the claimed display device and that items 14, 16 and 18 meet the claimed at least two screens. Applicants respectfully disagree with this characterization of item 12. Item 12 is a "plurality of screens 12" as stated in several places in Lechner (e.g. column 5, lines 54-55). Figure 4 clearly states that item 12 is "DISPLAY SCREEN 1," "DISPLAY SCREEN 2" and "DISPLAY SCREEN 3." The plurality of display screens 12 is not a separate display device, but is a reference number to refer to the same plurality of display screens referred to individually as 14, 16 and 18. As stated at column 5, lines 53-67:

As illustrated in FIG. 1, a visual display system 10, such as a flight simulation system, includes a plurality of display screens 12. ... As illustrated, the flight simulation system can include a front screen 14 positioned in front of the operator and an upper screen 16 mounted adjacent to and above the front screen. As illustrated, the upper screen slopes upwardly in a direction from the front screen toward the operator. In addition, the flight simulation system generally includes first and second

opposed side screens 18 adjacent to both the front screen and the upper screen and extending laterally beside the operator.

Thus, referring to the plurality of display screens 12 and display screens 14, 16 and 18 as separate elements is incorrect. These are two methods used in Lechner of referring to the same thing. Thus, when the Office Action cites the plurality of display screens 12 as meeting the at least one display device limitation of claim 1 and cites display screens 14, 16 and 18 as meeting the at least two screens limitation of claim 1, the Office Action is using one element of Lechner to meet two limitations of claim 1. Thus, Lechner doesn't show one or the other element of the claim. One element of a reference cannot be read onto two elements of a claim.

Further, claim 1 includes the limitation that the display device is "for displaying the images that are to be projected onto the screens." The plurality of display screens 12 in Lechner does not display anything that is to be projected onto any screen. The plurality of screens 12 only receives projected images from a plurality of projectors 28. Therefore, the plurality of display screens 12 does not meet the limitations of the display device of claim 1 as alleged in the Office Action.

Therefore, Lechner does not show every limitation of claim 1. To anticipate, a reference must show, expressly or inherently, every limitation of the claim. MPEP §2131. Therefore, the cited prior art does not anticipate claim 1. Claims 2-6, 9 and 10 are dependent upon claim 1 and thus include every limitation of claim 1. Therefore, claims 2-6, 9 and 10 are also not anticipated by the cite prior art.

Also in contrast to the cited prior art, claim 11 includes,

- a step of installing at least two screens onto which images are projected;

- a step of installing at least one display device for displaying the images that are to be projected onto the screens, wherein the images displayed on two of said at least two screens are different, a total number of display devices being smaller than a total number of screens;

- a step of installing at least one projection optical system for projecting the images displayed on the display device onto the screens, and

a step of projecting the images displayed on the display device through the projection optical system onto the screens.

As noted above, the cited reference does not show or suggest the use of a total number of display devices that is smaller than the total number of screens. In addition, the plurality of display screens 12 does not meet the limitations of the display device of claim 11.

Therefore, the cited prior art does not anticipate claim 11. Claims 12-17, 19 and 20 are dependent upon claim 11 and thus include every limitation of claim 11. Therefore, claims 12-17, 19 and 20 are also not anticipated by the cited prior art.

Accordingly, it is respectfully requested that the rejection of claims 1-6, 9-17, 19 and 20 under 35 U.S.C. § 102(e) as allegedly being anticipated by Lechner, be reconsidered and withdrawn.

#### **35 U.S.C. § 103(a) Rejection**

The rejection of claims 7, 8, 17 and 18 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Lechner in view of Yamazaki, is respectfully traversed based on the following.

The Yamazaki patent shows a system whereby viewers may view different images on the same display. A monitor 11 shows a display image that is interleaved in time (Figure 2). The viewers wear special glasses (13 and 14) that include LCD shutters. The shutter on a first pair of glasses is timed to correspond to a first image displayed by the monitor and the shutter of the second pair of glasses is timed to correspond to a second image. In this way, the viewer wearing the first image only sees the first image and the viewer wearing the second pair of glasses only sees the second image.

To demonstrate a *prima facie* case for obviousness, every element of the claim must be shown or suggested in the combined references. MPEP §2143. As noted above, the Lechner patent does not show or suggest a system having a smaller number of display devices than the number of screens and the plurality of display screens 12 does not meet the limitations of the at least one display device of claim 1. The Yamazaki patent does not

remedy this deficiency. Claims 7 and 8 are dependent upon claim 1 and thus include every limitation of claim 1. Therefore, the cited prior art does not show or suggest every element of claims 7 and 8.

As noted above, the Lechner patent does not show or suggest a system having a smaller number of display devices than the number of screens and the plurality of display screens 12 does not meet the limitations of the at least one display device of claim 11. The Yamazaki patent does not remedy this deficiency. Claims 17 and 18 are dependent upon claim 11 and thus include every limitation of claim 11. Therefore, the cited prior art does not show or suggest every limitation of claims 17 and 18. Thus, the cited prior art does not support a *prima facie* case for obviousness and thus claims 7, 8, 17 and 18 are non-obvious.

Accordingly, it is respectfully requested that the rejection of claims 7, 8, 17 and 18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lechner in view of Yamazaki, be reconsidered and withdrawn.

### **CONCLUSION**

Wherefore, in view of the foregoing amendments and remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.


This Amendment does not increase the number of independent claims, does not increase the total number of claims, and does not present any multiple dependency claims. Accordingly, no fee based on the number or type of claims is currently due. However, if a fee, other than the issue fee, is due, please charge this fee to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260.

Any fee required by this document other than the issue fee, and not submitted herewith should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any other fee required for such Petition for Extension of Time and any other fee required by this document pursuant to 37 C.F.R. §§ 1.16 and 1.17, other than the issue fee, and not submitted herewith should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

By:   
Douglas A. Sorensen  
Registration No. 31,570  
Attorney for Applicants

DAS/lhb:bar  
SIDLEY AUSTIN BROWN & WOOD LLP  
717 N. Harwood, Suite 3400  
Dallas, Texas 75201  
Direct: (214) 981-3482  
Main: (214) 981-3300  
Facsimile: (214) 981-3400  
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